

United States District Court  
Middle District of Pennsylvania

Jasmine Malseed,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Docket No. 1:23-cv-01329-CCC
	)	
Penbrook Borough, et al.	)	
	)	
Defendants.	)	

**Joint Motion for Stay of All Deadlines  
Pending Completion of Settlement Negotiations**

The parties have agreed to renew settlement negotiations in this matter. To maximize the prospects for a potential settlement by avoiding additional attorney's fees and expenses, the parties jointly request that the Court stay all other proceedings and deadlines pending the outcome of those negotiations. The reasons for this motion are as follows:

1. The parties have completed substantial discovery in this case, including the depositions of all but one of the named parties.
2. The parties decided at this juncture to renew settlement negotiations before addressing final discovery issues and moving on to the next steps in this litigation.

3. In order “to secure the just, speedy, and inexpensive determination of [this] action,” Fed. R. Civ. P. 1, the parties request that the Court stay all pending discovery-related deadlines and Court-ordered deadlines (including the deadlines in the Court’s Scheduling Order (ECF No. 84) and the recent order regarding Susquehanna Township’s motion to dismiss (ECF No. 95)) until the conclusion of the settlement negotiations.

4. The parties will provide the Court with a joint status report no later than September 6, 2024, to update the Court on the status of the settlement negotiations and inform the Court whether the stay should be lifted.

Because good cause has been shown, the parties respectfully request that the Court stay all pending deadlines in this case.

Date: August 9, 2024

Respectfully submitted,

/s/ Joseph P. Guzzardo  
Joseph P. Guzzardo (ID # 95089)  
Guzzardo & Associates LLC  
121 S. Broad Street, Ste. 1600  
Philadelphia, PA 19107  
Telephone: (215) 718-6691  
jguzzardo@guzzardolaw.com

Johson and Webbert LLP  
1 Bowdoin Mill Island #300  
Topsham, ME 04086  
Telephone: (207) 623-5110  
jguzzardo@work.law

Braden A. Beard (pro hac vice)  
Johnson & Webbert, LLP  
1 Bowdoin Mill Island, Ste. 300  
Topsham, ME 04086  
Telephone: (207) 623-5110  
bbeard@work.law

*Attorneys for Plaintiff*

/s/ David K. MacMain  
David J. MacMain  
Matthew S. Polaha  
Attorney I.D. Nos. 59320 / 320674  
433 W. Market Street, Suite 200  
West Chester, PA 19382  
Telephone: (484) 318-7106  
Fax: (484) 328-3996  
dmacmain@macmainlaw.com  
mpolaha@macmainlaw.com

*Attorneys for Defendants Susquehanna  
Township, Sgt. Aaron Osman, and Officer  
Ryan Lindsley*

/s/ Benjamin P. Novak  
Benjamin P. Novak, Esq. (ID #326182)  
1860 Charter Lane, Suite 201  
Lancaster, PA 17601  
Phone: (717) 696-0551  
Fax: (717) 229-1239  
bnovak@fhmslaw.com

*Attorneys for Defendants Penbrook  
Borough and Officer Isaac Tritt*

### Certificate of Service

I hereby certify that on August 9, 2024, I electronically filed this filing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Date: August 9, 2024

/s/ Joseph P. Guzzardo  
Joseph P. Guzzardo  
Guzzardo & Associates LLC  
121 S. Broad Street, Ste. 1600  
Philadelphia, PA 19107  
Telephone: (205) 718-6691  
jguzzardo@guzzardolaw.com